UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY



IN THE MATTER OF	Ma ZI II OL	
*) DOCKET NO. 08-77-LNG	
CHENIERE MARKETING, INC.)	

MOTION OF SHELL NA LNG LLC TO INTERVENE

Pursuant to 10 C.F.R. § 590.303 Shell NA LNG LLC ("Shell LNG") hereby moves to intervene in this proceeding initiated by Cheniere Marketing, Inc.'s ("CMI") application filed in this docket on August 15, 2008. In support hereof, Shell LNG states as follows:

I. COMMUNICATIONS AND CORRESPONDENCE

Communications and correspondence regarding this docket should be directed to the following representatives of Shell LNG:

R.J. Pautsch Shell NA LNG LLC 910 Louisiana, 41st Floor Houston, Texas 77002 (713) 241-3570 r.j.pautsch@shell.com Michael Cathey Shell NA LNG LLC 910 Louisiana, 41st Floor Houston, Texas 77002 (713) 241-7777 michael.cathey@shell.com

Charles H. Shoneman
Bracewell & Giuliani LLP
2000 K Street, N.W., Suite 500
Washington, D.C. 20006
(202) 828-5860
charles.shoneman@bgllp.com

II. IDENTITY AND INTEREST OF SHELL LNG

Shell LNG imports liquefied natural gas ("LNG") into the United States. Shell LNG is an affiliate of Shell Oil Company, which is involved in the domestic and international LNG business. Shell LNG holds firm capacity at the Cove Point LNG terminal and at the Elba Island LNG terminal. Shell LNG will also be the capacity holder at the Broadwater LNG terminal.

III. CMI'S FILING

On August 15, 2008, CMI filed an application pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the U.S. Department of Energy's (DOE") regulations, 10 C.F.R. Part 590 (2008). In its application, CMI requests that DOE's Office of Fossil Energy ("FE") issue an order granting CMI blanket authorization to engage in exports of LNG previously imported into the United States to international locations including Belgium, Spain, Japan, Korea, India, China, Taiwan, France, Italy, the United Kingdom, Brazil, Argentina, Chile, Portugal, Mexico, Turkey and the Dominican Republic. CMI states that it proposes to engage in short-term, spot market exports of up to 64 Bcf. Additionally, CMI states that it may load LNG for delivery to Puerto Rico. CMI states that it will not export domestically-produced LNG or natural gas, nor will it export LNG to countries with which trade is prohibited by law. CMI requests that this blanket authorization be granted commencing on the date of authorization and terminating two years later. CMI states that it proposes to export volumes of imported LNG on its own behalf or as agent for others.

IV. INTERVENTION

As an importer of LNG, Shell LNG has immediate, direct and substantial legal and economic interests in matters raised by CMI's application in this docket. These interests cannot be adequately

represented by any other party. The intervention of Shell LNG in this docket is therefore in the public interest.

WHEREFORE, Shell LNG requests that it be permitted to intervene in this docket with full rights as a party.

Respectfully submitted,

Charles H. Shoneman

Bracewell & Giuliani LLP

2000 K Street, N.W.

Washington, D.C. 20006

(202) 828-5800

Attorney for

SHELL NA LNG LLC

September 11, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing on the parties listed below.

Lisa M. Tonery Fulbright & Jaworski L.L.P. 666 Fifth Avenue New York, New York 10103

Dated at Washington, D.C. this 11th day of September 2008.

Charles H. Shoneman

245680.1